

Moving companies have known about the impending rule changes for quite some time. Rather than adopt an attitude of compliance, they have adopted an attitude of defiance.

They have gambled that their far-reaching efforts to maintain the status quo would be successful. As such, they arrogantly refused to consider that the new regulations would ever actually go into effect. They simply hoped and planned that the problem would be made to "go away" without requiring any significant change in their modus operandi.

Had the moving companies been acting in good faith, they would have immediately commenced any necessary re-training activities as a contingency plan, in the event that their lobbying efforts were unsuccessful. Unfortunately, their scofflaw strategy has now left them in a position where they claim that there is not enough time to implement the necessary changes. This position, even if it is true, is entirely of their own creation.

Firstly, I question their characterization of the required changes as cumbersome, complex and oppressive. Legitimate companies operating in good faith from estimate to delivery will experience no measurable impact as a result of the new regulations. The very essence of the industry argument is but a smokescreen to distract attention from the reality that there is no valid reason for further delay.

Secondly, for those moving companies whose strenuous objections stretch the boundaries of credibility, I say that any crisis in which they find themselves is the direct result of their intentional, obstinate refusal to initiate compliance activities in a timely manner. We are all familiar with the statement "Failure to plan on your part does not constitute an emergency on my part".

In this case, willful, arrogant defiance of DOT/FMCSA authority does not constitute grounds for a time extension, especially since the sole beneficiaries of the extension would be the defiant ones. I urge you to allow the regulations to move forward as planned. Do not reward the rebellious, unsuccessful gamble adopted by the AMSA and other moving companies. If indeed there is inconvenience to these moving companies as a result of the new regulations, then perhaps that inconvenience is precisely the impetus needed to prompt much-needed change, and counter the arrogance and complacency that have infected the industry for so long.